

Intellicall Operator Services, Inc.  
5000 Sawgrass Village Circle  
Suite 30  
Ponte Vedra Beach, FL 32082

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T.R.A. DOCKET ROOM

October 14, 2003

Ron Jones, Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

**RE: Compliance with Tenn. Code Ann. 65-21-114(a) - Intellicall Operator Services, Inc.**

Dear Mr. Jones:

This letter is in response to your correspondence dated September 16, 2003, regarding compliance with Tenn. Code Ann. 65-21-114(a). You graciously provided Intellicall Operator Services Inc. an extension to October 15, 2003 for response. Our response is provided below.

Intellicall Operator Services, Inc. is a reseller of long distance services and is currently in compliance with the requirement for toll free countywide calling. Intellicall maintains compliance with the Code through development of a process whereby all calls that originate in the State of Tennessee are matched to a county look up table. The county look up is based on NPA, NXX and LERG information. The look up process applies to all direct dialed and toll free calls.

Intellicall continues to develop the look up table so that it remains current but that is our largest difficulty in maintaining compliance. We would appreciate any direction from the Commission or other telecommunications companies related to a source where we could obtain regularly updated county tables.

Please do not hesitate to contact me at (407) 971-6801 if you have questions or concerns.

Best Regards,

*Marsha A. Pokorny*

Marsha A. Pokorny  
Manager - Regulatory Compliance  
Intellicall Operator Services, Inc.

Cc: Robin Collins  
File